

PLEASE NOTE

**This image contains more than one label
approved for this product on this date.**

83588-1

6/13/2013

119



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Micah T. Reynolds
Technology Science Group Inc.
1150 18th Street, Suite 1000
Washington, DC 20036:

JUN 13 2013

Subject: Label Notification(s) for Pesticide Registration Notice 98-10

Dear Mr. Reynolds:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated June 10, 2013 for the following product(s):

No Fly Zone

EPA Reg. No. 83588-1

The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, please contact Linda A. DeLuise at 703-305-5428.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Gebken".

Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7504P)



Technology Sciences Group Inc.
1150 18th Street, Suite 1000
Washington, DC 20036
Direct: (202) 828-8967
Fax: (202) 872-0745
E-Mail: MReynolds@TSGUSA.com

Micah T. Reynolds
Senior Regulatory Consultant

June 10, 2013

**International Textile Group, Inc.
Submission of Label Notification for
No Fly Zone; EPA Reg. No. 83588-1**

Mr. Richard Gebken (PM-10)
Insecticide Branch/Registration Division (NOTIF)
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Document Processing Center
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Gebken:

Technology Sciences Group, Inc., on behalf of International Textile Group, Inc. (ITG), is submitting the enclosed label notification to add an alternate brand name, "Insect Defense System", to the above-referenced product label. This Notification submission supersedes the present action, submitted in mid-May, for the same product to add "Insect Defense System" as an optional marketing claim. The enclosed label version includes the statement both as optional marketing text as well as an alternate product brand name. Please find enclosed the following documents supporting this notification:

- 1) EPA Notification Form (EPA Form 8570-1);
- 2) One copy of the revised label with changes highlighted;
- 3) Two clean copies of the revised label.

If you have any questions or require additional information or clarification, please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at mreynolds@tsgusa.com.

Sincerely,

Regulatory Consultant to
International Textile Group, Inc.

Enclosures

CC: M. Garlick (ITG); D. Beusse (ITG); N. Bebo (ITG); R. Robinson (ITG)

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

No Fly Zone™

(MASTER LABEL)

Sublabel A:	Permethrin-Treated Fabric uses for Garments
Sublabel B:	Permethrin-Treated Fabric uses for Gear
Sublabel C:	Permethrin-Treated Fabric uses for Dog & Horse Products/Gear
Sublabel D:	Affixed Tag/Label - ALL Garments, Gear, or Dog/Horse Products
Optional Label Claims	

EPA Reg. No.: 83588-1
EPA Establishment No.: TBD

Manufactured [by] [for]:
International Textile Group, Inc.
804 Green Valley Road, Suite 300
Greensboro, NC 27408 USA

NOTIFICATION
JUN 13 2013

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(SUBLABEL A: MASTER LABEL - GARMENT)

(Note to Reviewer: the following garments may be made from No Fly Zone™ fabric: *men's and women's shirts, pants, shorts, cargo shorts, hats, jackets, pullovers, scarves, bandanas, socks, shoe coverings, and vests.* Their names may be used in place of the word "garment" in the text of the marketplace label.)



(Alternate Brand Names: **Mity-Tex, Mity Tex, Insect Defense System**)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]:
International Textile Group, Inc.
804 Green Valley Road, Suite 300
Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin.....	0.52%
Other Ingredient (Garment).....	99.48%
TOTAL	100.00%

EPA Reg. No. 83588-1
EPA Est. No.

- The fabric in this [garment] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [garment] is bound to the fabric and remains effective for 70 washings [for washable garments].

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [garment]. DO NOT DRY CLEAN [GARMENT] (dry cleaning removes the Permethrin active ingredient). DO NOT ADD OTHER PERMETHRIN INSECT REPELLENT PRODUCTS TO THIS [GARMENT].

- International Textile Group, Inc. cannot guarantee complete protection from insects, insect bites, related diseases or reactions.

STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [garment] is worn out.
- Do not use or reuse [garment] for purposes other than originally intended.

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(SUBLABEL B: MASTER LABEL - GEAR)

(Note to Reviewer: the following gear articles may be made from No Fly Zone™ fabric: *tents, tent mesh, tent netting, tent liner, umbrella, bivouac sack, bivy sack, bivvy bag, bivi bag, bivi, sleeping bag covers, backpacks, tarps, tent ground cloths, outdoor furniture covers, outdoor furniture cushion covers, camping chairs, patio umbrella covers.* Their names may be used in place of the word "gear" in the text of the marketplace label.)



(Alternate Brand Names: **Mity-Tex, Mity Tex, Insect Defense System**)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]:
International Textile Group, Inc.
804 Green Valley Road, Suite 300
Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin.....	0.52%
Other Ingredient (Gear fabric).....	99.48%
TOTAL	100.00%

EPA Reg. No. 83588-1
EPA Est. No.

- The fabric in this [gear] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [gear] is bound to the fabric and remains effective for 70 washings [for washable gear].

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [gear]. **DO NOT DRY CLEAN [GEAR]** (dry cleaning removes the Permethrin active ingredient). **DO NOT ADD OTHER PERMETHRIN INSECT REPELLENT PRODUCTS TO THIS [GEAR].**

- International Textile Group, Inc. cannot guarantee complete protection from insects, insect bites, related diseases or reactions.

STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [gear] is worn out.
- Do not use or reuse [gear] for purposes other than originally intended.

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(SUBLABEL C: MASTER LABEL – DOG & HORSE PRODUCTS/GEAR)

(Note to Reviewer: the following dog/horse products/gear may be made from No Fly Zone™ fabric: *dog bedding, kennel covers, horse blankets, stall covers, dog shirts, dog hats, dog bandanas, dog collars*. Their names may be used in place of the word “dog/horse product/gear” in the text of the marketplace label.)



(Alternate Brand Names: **Mity-Tex, Mity Tex, Insect Defense System**)
[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]:
International Textile Group, Inc.
804 Green Valley Road, Suite 300
Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin.....	0.52%
Other Ingredient [(Dog/Horse Product/Gear)]	99.48%
TOTAL	100.00%

EPA Reg. No. 83588-1
EPA Est. No.

- The fabric in this [dog/horse product/gear] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [dog/horse product/gear] is bound to the fabric and remains effective for 70 washings [for washable dog/horse products/gear].

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [dog/horse product/gear]. DO NOT DRY CLEAN [dog product/apparel] (dry cleaning removes the Permethrin active ingredient). DO NOT ADD OTHER PERMETHRIN INSECT REPELLENT PRODUCTS TO THIS [dog/horse product/gear].

- International Textile Group, Inc. cannot guarantee complete protection from: insects, insect bites, related diseases or reactions.

STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [dog/horse product/gear] is worn out.
- Do not use or reuse [dog/horse product/gear] for purposes other than originally intended.

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

**(SUBLABEL D: MASTER LABEL – AFFIXED GARMENT,
GEAR, or DOG/HORSE PRODUCT/GEAR TAG)**

No Fly Zone™

(Alternate Brand Names: **Mity-Tex, Mity Tex, Insect Defense System**)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Contains Permethrin (0.52%) that repels mosquitoes, ants, ticks, chiggers, flies and midges.
Active ingredient remains effective for 70 washings [for washable gear] [for washable garments]
[for washable dog/horse products/gear].

Do Not Dry Clean.

Dispose of worn out [gear] [garment] [dog/horse product/gear] in trash.

EPA Reg. No. 83588-1

EPA Est. No.

Refer to hangtag for detailed information.

THIS TAG MUST NOT BE REMOVED.

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

Optional Label Claims for Garment, Gear, or Dog/Horse Product/Gear Hang Tags AND/OR Tag affixed to Garment, Gear Article, or Dog/Horse Product:

- Apparel that repels insects
- Garments that repel insects
- Garment that repels insects
- Gear that repels insects
- Insect repellent clothing
- Insect repellent apparel
- Insect repellent gear
- Clothing that repels insects
- Insect repellent protection [in a] [clothing] [garment] [jacket] [shirt] [pair of pants] [pair of shorts] [hat]
- Repels mosquitoes
- Repels ticks
- Built-in insect repellent technology [that lasts through 70 washes]
- Insect Defense System
- Insect Defense
- [Tents] [Tent mesh] [Tent liner] [Umbrella] [Bivouac sack] [Bivy Sack] [Bivvy Bag] [Bivi Bag] [Bivy] [Sleeping bag cover] [Backpack] [Outdoor furniture] that repels insects
- © 2010 International Textile Group, Inc. No Fly Zone™, and Burlington® are registered trademarks owned or held under license by International Textile Group, Inc.

Optional Logos and Pictograms for Hang Tag:

- Pictogram(s) of target insects (mosquito, ant, tick, chigger, fly, and/or midge)
- Burlington Labs logo

NEXT

LABEL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

6-13-13

Mike Garlich
International Textile Group, Inc.
804 Green Valley Road, Suite.300
Greensboro, NC 27408-7039

Subject: Amended Reregistration Label
Product Name: No Fly Zone
EPA Registration Number: 83588-1

Dear Mr. Garlich:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of the above referenced product in connection with the permethrin RED(s), and has concluded that your submission is acceptable.

NOTE: This product is not being reregistered under sections 3(c)5 and 4(g) of FIFRA at this time.

Please note that the record for this product currently contains the Confidential Statements of Formulation (CSFs) listed below. Any previously dated CSFs are superseded.

- Basic CSF dated 10-1-12 and Alt. CSF dated 12-11-12

A copy of your label stamped "Accepted" is enclosed for the subject product. Products shipped after 12 months from the date of this amendment or the next printing of the label whichever occurs first, must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

Page 2
EPA Reg. 83588-1

If you have any questions about this letter, please contact either Erik Kraft at (703-308-9358) or via email at Kraft.Erik@epa.gov or Richard J. Gebken at (703) 305-6701 or via e-mail at Gebken.Richard@epa.gov.

Sincerely yours,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

No Fly Zone™

(MASTER LABEL)

Sublabel A:	Permethrin-Treated Fabric uses for Garments
Sublabel B:	Permethrin-Treated Fabric uses for Gear
Sublabel C:	Permethrin-Treated Fabric uses for Dog & Horse Products/Gear
Sublabel D:	Affixed Tag/Label - ALL Garments, Gear, or Dog/Horse Products
Optional Label Claims	

EPA Reg. No.: 83588-1
EPA Establishment No.: TBD

Manufactured [by] [for]:
International Textile Group, Inc.
804 Green Valley Road, Suite 300
Greensboro, NC 27408 USA

ACCEPTED
6-13-13
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under
EPA Reg. No. 83588-1

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(SUBLABEL A: MASTER LABEL - GARMENT)

(Note to Reviewer: the following garments may be made from No Fly Zone™ fabric: *men's and women's shirts, pants, shorts, cargo shorts, hats, jackets, pullovers, scarves, bandanas, socks, shoe coverings, and vests.* Their names may be used in place of the word "garment" in the text of the marketplace label.)



(Alternate Brand Names: Mity-Tex, Mity Tex, Insect Defense System)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]:
International Textile Group, Inc.
804 Green Valley Road, Suite 300
Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin.....	0.52%
Other Ingredient (Garment).....	99.48%
TOTAL	100.00%

EPA Reg. No. 83588-1
EPA Est. No.

- The fabric in this [garment] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks; chiggers, flies, and midges.
- Permethrin in this [garment] is bound to the fabric and remains effective for 70 washings [for washable garments].
- For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [garment]. DO NOT DRY CLEAN [GARMENT] (dry cleaning removes the Permethrin active ingredient). DO NOT ADD OTHER PERMETHRIN INSECT REPELLENT PRODUCTS TO THIS [GARMENT].

- International Textile Group, Inc. cannot guarantee complete protection from insects, insect bites, related diseases or reactions.

STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [garment] is worn out.
- Do not use or reuse [garment] for purposes other than originally intended.

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(SUBLABEL B: MASTER LABEL - GEAR)

(Note to Reviewer: the following gear articles may be made from No Fly Zone™ fabric: *tents, tent mesh, tent netting, tent liner, umbrella, bivouac sack, bivy sack, bivy bag, bivi bag, bivi, sleeping bag covers, backpacks, tarps, tent ground cloths, outdoor furniture covers, outdoor furniture cushion covers, camping chairs, patio umbrella covers*. Their names may be used in place of the word "gear" in the text of the marketplace label.)



(Alternate Brand Names: **Mity-Tex, Mity Tex, Insect Defense System**)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]:
International Textile Group, Inc.
804 Green Valley Road, Suite 300
Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin.....	0.52%
Other Ingredient (Gear fabric).....	99.48%
TOTAL	100.00%

EPA Reg. No. 83588-1
EPA Est. No.

- The fabric in this [gear] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [gear] is bound to the fabric and remains effective for 70 washings [for washable gear].
- For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [gear]. **DO NOT DRY CLEAN [GEAR]** (dry cleaning removes the Permethrin active ingredient). **DO NOT ADD OTHER PERMETHRIN INSECT REPELLENT PRODUCTS TO THIS [GEAR].**

- International Textile Group, Inc. cannot guarantee complete protection from insects, insect bites, related diseases or reactions.

STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [gear] is worn out.
- Do not use or reuse [gear] for purposes other than originally intended.

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(SUBLABEL C: MASTER LABEL – DOG & HORSE PRODUCTS/GEAR)

(Note to Reviewer: the following dog/horse products/gear may be made from No Fly Zone™ fabric: *dog bedding, kennel covers, horse blankets, stall covers, dog shirts, dog hats, dog bandanas, dog collars.* Their names may be used in place of the word “dog/horse product/gear” in the text of the marketplace label.)



(Alternate Brand Names: **Mity-Tex, Mity Tex, Insect Defense System**)
[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]:
International Textile Group, Inc.
804 Green Valley Road, Suite 300
Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin.....	0.52%
Other Ingredient [(Dog/Horse Product/Gear)].	<u>99.48%</u>
TOTAL	100.00%

EPA Reg. No. 83588-1
EPA Est. No.

- The fabric in this [dog/horse product/gear] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [dog/horse product/gear] is bound to the fabric and remains effective for 70 washings [for washable dog/horse products/gear].

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [dog/horse product/gear]. DO NOT DRY CLEAN [dog product/apparel] (dry cleaning removes the Permethrin active ingredient). DO NOT ADD OTHER PERMETHRIN INSECT REPELLENT PRODUCTS TO THIS [dog/horse product/gear].

- International Textile Group, Inc. cannot guarantee complete protection from insects, insect bites, related diseases or reactions.

STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [dog/horse product/gear] is worn out.
- Do not use or reuse [dog/horse product/gear] for purposes other than originally intended.

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

**(SUBLABEL D: MASTER LABEL – AFFIXED GARMENT,
GEAR, or DOG/HORSE PRODUCT/GEAR TAG)**

No Fly Zone™

(Alternate Brand Names: **Mity-Tex, Mity Tex, Insect Defense System**)
[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Contains Permethrin (0.52%) that repels mosquitoes, ants, ticks, chiggers, flies and midges.
Active ingredient remains effective for 70 washings [for washable gear] [for washable garments]
[for washable dog/horse products/gear].

Do Not Dry Clean.

Dispose of worn out [gear] [garment] [dog/horse product/gear] in trash.

EPA Reg. No. 83588-1

EPA Est. No.

Refer to hangtag for detailed information.

THIS TAG MUST NOT BE REMOVED.

Optional Label Claims for Garment, Gear, or Dog/Horse Product/Gear Hang Tags AND/OR Tag affixed to Garment, Gear Article, or Dog/Horse Product:

- Apparel that repels insects
- Garments that repel insects
- Garment that repels insects
- Gear that repels insects
- Insect repellent clothing
- Insect repellent apparel
- Insect repellent gear
- Clothing that repels insects
- Insect repellent protection [in a] [clothing] [garment] [jacket] [shirt] [pair of pants] [pair of shorts] [hat]
- Repels mosquitoes
- Repels ticks
- Built-in insect repellent technology [that lasts through 70 washes]
- Insect Defense System
- Insect Defense
- [Tents] [Tent mesh] [Tent liner] [Umbrella] [Bivouac sack] [Bivy Sack] [Bivvy Bag] [Bivi Bag] [Bivy] [Sleeping bag cover] [Backpack] [Outdoor furniture] that repels insects
- © 2010 International Textile Group, Inc. No Fly Zone™, and Burlington® are registered trademarks owned or held under license by International Textile Group, Inc.

Optional Logos and Pictograms for Hang Tag:

- Pictogram(s) of target insects (mosquito, ant, tick, chigger, fly, and/or midge)
- Burlington Labs logo